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F#2013R00031

★ JAN 14 2013 ★

LONG ISLAND OFFICE  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

13-0028M

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UNITED STATES OF AMERICA

-against-

ALEXIS GONZALEZ,

Defendant.

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF AN  
APPLICATION FOR AN  
ARREST WARRANT

(18 U.S.C. § 1344)

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EASTERN DISTRICT OF NEW YORK, SS:

DANIEL BANKS, being duly sworn, deposes and states that he is a Special Agent with the United States Secret Service, duly appointed according to law and acting as such.

On or about and between May and July 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALEXIS GONZALEZ, together with others, did knowingly and intentionally execute a scheme and artifice to defraud a financial institution, to wit: Wells Fargo Bank, to obtain monies, funds, credits, assets and other property owned by or under the custody and control of the Bank, by means of false pretenses, representations and promises.

(Title 18, United States Code, Section 1344)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I have been a Special Agent with the United States Secret Service for approximately five years. I have been involved in the investigation of numerous cases of bank fraud. I am familiar with the facts and circumstances set forth below from my direct participation in the investigation.

2. Starting in or about May of 2012 and continuing through in or about July 2012, the defendant, ALEXIS GONZALEZ, an Assistant Branch Manager with Wells Fargo Bank at 9 Northern Boulevard, Greenvale, New York, accessed and obtained account profiles, including account holder names, dates of birth, addresses, social security numbers, and signature cards, associated with 25 Wells Fargo bank accounts in various states across the country and one overseas account.

3. Defendant ALEXIS GONZALEZ sold the account information to two third parties, who in turn withdrew a total of \$138,660 from the accounts using counterfeit identification.

4. On or about July 13, 2012, a representative of Wells Fargo approached defendant ALEXIS GONZALEZ after a Wells

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Fargo fraud alert system indicated that GONZALEZ had accessed all 25 compromised accounts. GONZALEZ admitted that he had accessed the accounts and was suspended from employment immediately.

5. On or about August 14, 2012, I interviewed defendant ALEXIS GONZALEZ at a Wells Fargo office in Manhattan. I read defendant GONZALEZ his Miranda rights, which he waived orally and in writing. Defendant GONZALEZ stated, in substance and in part, that he accessed Wells Fargo bank accounts, obtained account holder information, and sold that information to third parties who had instructed him to access accounts from Texas, North Carolina, South Carolina, Georgia, Florida, and Pennsylvania with holdings in excess of \$10,000. The defendant submitted a sworn written statement attesting to the above-described information.

6. I have personally reviewed bank records associated with each of the compromised accounts. The records reflect that a total of \$138,660 was withdrawn, in person, in the United States, from the compromised accounts from June to July of 2012. Each of the 25 account holders has submitted an affidavit indicating that he/she did not execute the withdrawals in question.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for defendant ALEXIS GONZALEZ so that he may be dealt with according to law.



DANIEL BANKS  
Special Agent  
United States Secret Service

Sworn to before me this  
14<sup>th</sup> day of ~~January~~ 2013

/S/ E. Thomas Boyle, MJ

HON. E. THOMAS BOYLE  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK